### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL No. 2327

THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBITS ATTACHED HERETO

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

#### JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibits A - B, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or E thicon LLC (col lectively, the "Ethicon Defendants"), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants rem ain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

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#### **CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

# EXHIBIT A (Levin PapantonioThomas Mitchell Rafferty & Proctor)

Civil Action No.	Case Style
2:12-cv-09956	Alina Garcia v. Ethicon, Inc; Ethicon, LLC; Johnson & Johnson
	Sandy Herron and Richard Herron v. Ethicon, Inc.; Ethicon, LLC; Johnson &
2:13-cv-12935	Johnson
2:13-cv-13379	Wanda Mills and Lowell Mills v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-13415	Christy Sumrall v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-19082	Darlene Raby v. Ethicon, Inc; Ethicon, LLC; Johnson & Johnson
2:13-cv-19669	Trilby Anderson v. Ethicon, Inc; Ethicon, LLC; Johnson & Johnson
2:13-cv-23482	Cindy Wallace v. Ethicon, Inc; Ethicon, LLC; Johnson & Johnson
2:13-cv-23934	Amber Cummins v. Ethicon, Inc; Ethicon, LLC; Johnson & Johnson
	Rhonda Milligan and Mark Milligan v. Ethicon, Inc; Ethicon, LLC; Johnson &
2:13-cv-24701	Johnson
	Jacquelyn Phelps and Beman Phelps v. Ethicon, Inc; Ethicon, LLC; Johnson &
2:13-cv-24707	Johnson
	Kristin Esposito and Shane Esposito v. Ethicon, Inc; Ethicon, LLC; Johnson &
2:13-cv-31551	Johnson
	Crystal McCain and Steve McCain v. Ethicon, Inc; Ethicon, LLC; Johnson &
2:14-cv-00442	Johnson
2:14-cv-22774	Carol Sequin and James Sequin v. Ethicon, Inc; Johnson & Johnson
2:14-cv-26497	Sharon Conlin v. Ethicon, Inc; Ethicon, LLC; Johnson & Johnson
2:14-cv-30993	Angela Gambill and Joseph Gambill v. Ethicon, Inc; Johnson & Johnson
2:15-cv-01334	Randy Jones and Rosa Jones v. Ethicon, Inc; Johnson & Johnson
2:16-cv-03494	Lisa Hubbs v. Ethicon, Inc; Johnson & Johnson

## EXHIBIT B (Loncar & Associates)

Civil Action No.	Case Style
	Maria Baquera and Ruben Baquera v. Ethicon, Inc; Ethicon, LLC; Johnson &
2:13-cv-06111	Johnson
	Joe Escamilla, Individually and as Administrator of the Estate of Eve Escamilla,
2:13-cv-17871	Deceased v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson